

SEALED BY ORDER
OF THE COURT
CR 15

00034

E-filing

UNITED STATES DISTRICT COURT

EJD

NORTHERN DISTRICT OF CALIFORNIA

HRL

SAN JOSE DIVISION

THE UNITED STATES OF AMERICA

vs.

CHRISTIAN REIMER STUKENBROCK,

a/k/a Reimar Stuckenbrock, a/k/a Reymar Stuckenbrock, a/k/a Reimar
Christian Heinrich Julius Stuckenbrock, a/k/a Christian Stuckenbrock

INDICTMENT

Counts One - Nine:

18 U.S.C. § 1343 – Wire Fraud

A true bill.

[Signature]

Foreperson

Filed in open court this
A.D. 201

15¹⁴ day of January

[Signature]

United States Magistrate Judge

Bail. \$ no bail/arrest warrant



SEALED BY ORDER
OF THE COURT

E-filing

MELINDA HAAG (CABN 132612)
United States Attorney

Filed
JAN 14 2015
RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

EJD

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTIAN REIMER STUKENBROCK,
a/k/a Reimar Stuckenbrock,
a/k/a Reymar Stuckenbrock,
a/k/a Reimar Christian Heinrich Julius
Stuckenbrock,
a/k/a Christian Stuckenbrock

Defendant.

CASE NO.

VIOLATIONS: 18 U.S.C. § 1343 – Wire Fraud; 18
U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)–
Forfeiture

SAN JOSE VENUE

INDICTMENT

The Grand Jury charges that, at all relevant times:

1. CHRISTIAN REIMER STUKENBROCK was a resident of Los Altos Hills, California,
and held himself out to be the Managing Director and President of Silicon Valley Technology Group.

2. Silicon Valley Technology Group (SVTG) was an entity originally founded in 2000 by
STUKENBROCK, and another individual who resigned in 2002. STUKENBROCK represented SVTG
to be a venture capital firm focusing on Silicon Valley start-up companies.

INDICTMENT

9. As part of his scheme, STUKENBROCK solicited almost \$22 million from GF for investments in at least seven companies, including: Albutec, GmbH, a German Company which produced blood purification machines; Protech Services, Inc., a company developing agricultural waste water treatment technology; Solar Power Partners, an independent solar power producer and distributor; Ticket Out Film Partners, a limited liability company developing a motion picture regarding domestic abuse; Ready Solar, a company providing residential solar technology; Shadow Mountain, a company providing construction management services; and Clean Mobile AG, a German company that produced and developed customer-specific drive systems and components for pedelecs, e-Bikes, and electric cargo vehicles.

10. STUKENBROCK invested a net amount of only about \$11.2 million of GF's money in these seven companies. Rather than invest the money as promised, he used approximately \$8.5 million for his own personal benefit, including: to pay for his housing; to support his own businesses, including True Exotic, a company that rented out high-end cars; and for other uses not related to the business of SVTG or the seven partner companies.

COUNTS ONE THROUGH NINE: (18 U.S.C. § 1343 – Wire Fraud)

11. Paragraphs 1 through 10 are realleged and incorporated as if fully set forth here.

12. On or about the dates set forth below, in the Northern District of California and elsewhere, the defendant,

CHRISTIAN REIMER STUKENBROCK,

for the purpose of executing a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted by means of wire communication in interstate and foreign commerce certain writings, signs, signals, and pictures, specifically electronic funds transfers, from GF to bank accounts held for the benefit of SVTG and from SVTG to accounts controlled by STUKENBROCK, as indicated below:

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COUNT	DATE	ITEM WIRED	WIRED FROM	WIRED TO
1	02/26/2010	\$22,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Union Bank in California
2	3/11/2010	\$280,000	GF's account at China Trust in Hong Kong (via CHIPS for Ticket Out)	SVTG's account at UBS in New York
3	05/07/2010	\$250,000	GF's account at China Trust in Hong Kong (via CHIPS for ProTech)	SVTG's account at UBS in New York
4	10/12/2010	\$235,482.50	GF's account at China Trust in Hong Kong (via CHIPS for Ticket Out)	SVTG's bank account at UBS in New York
5	10/12/2010	\$15,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Union Bank in California
6	10/26/2010	\$50,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Bank of America in California
7	1/14/2011	\$35,000	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Bank of America in California
8	02/08/2011	\$150,250	GF's account at China Trust in Hong Kong (via CHIPS for Solar Power Partners)	SVTG's account at UBS in New York
9	06/06/2011	\$36,500	SVTG's account at UBS in New York (via FEDWIRE)	True Exotic's account at Bank of America in California

FORFEITURE ALLEGATION: (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c))

13. Paragraphs 1 through 10, and the transactions alleged in each of Counts One through Nine, are realleged as if fully set forth here.

14. Upon a conviction of any of the offenses alleged in Counts One through Nine, the defendant, CHRISTIAN REIMER STUKENBROCK, shall forfeit to the United States all property constituting and derived from proceeds traceable to violations of Title 18, United States Code, Section 1343 (Wire Fraud), as alleged in Counts One through Nine of this Indictment.

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1 15. If any of the forfeitable property, as a result of any act or omission of the defendant:

- 2 a) cannot be located upon the exercise of due diligence;
3 b) has been transferred or sold to or deposited with a third person;
4 c) has been placed beyond the jurisdiction of the Court;
5 d) has been substantially diminished in value; or
6 e) has been commingled with other property which cannot be divided without difficulty;

7 the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States
8 Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).


9 All in violation of Title 18, United States Code, Section 1343 (Wire Fraud), Title 18, United
10 States Code, Section 981 (a)(1)(C) and Title 28, United States Code, Section 2461(c).

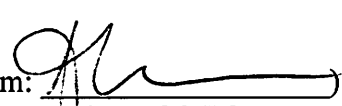
11 DATED:

A TRUE BILL.

12 
13 FOREPERSON

14 MELINDA HAAG
15 United States Attorney

16 
17 JEFFREY D. NEDROW
18 Chief, San Jose Branch

19 (Approved as to form: 
20 AUSA ROSEN
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DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT
☐ SUPERSEDING
OFFENSE CHARGED

18 U.S.C. § 1343 - Wire Fraud

- ☐
- Petty
-
- ☐
- Minor
-
- ☐
- Misdemeanor
-
- ☒
- Felony

 PENALTY: 20 years imprisonment
 \$250,000 fine or twice the gross gain or loss from the offense
 3 years supervised release
 \$100 special assessment fee

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DEFENDANT - U.S.

CHRISTIAN REIMER STUKENBROCK

DISTRICT COURT NUMBER

CR 15

00034

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

- 1)
- ☒
- If not detained give date any prior summons was served on above charges

- 2)
- ☐
- Is a Fugitive

- 3)
- ☐
- Is on Bail or Release from (show District)

IS IN CUSTODY

- 4)
- ☐
- On this charge

- 5)
- ☐
- On another conviction

☐ Federal ☐ State

- 6)
- ☐
- Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted
PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

FBI

- ☐
- person is awaiting trial in another Federal or State Court, give name of court

- ☐
- this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District

- ☐
- this is a reprosecution of charges previously dismissed which were dismissed on motion of:

SHOW DOCKET NO.

☐ U.S. ATTORNEY ☐ DEFENSE

- ☐
- this prosecution relates to a pending case involving this same defendant

MAGISTRATE CASE NO.

- ☐
- prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form MELINDA HAAG

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned)

AUSA Amber Rosen

ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**

- ☐
- SUMMONS
- ☐
- NO PROCESS*
- ☒
- WARRANT

Bail Amount: None

If Summons, complete following:

- ☐
- Arraignment
- ☐
- Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: Before Judge:

Comments: